

EXHIBIT 6

[Redacted Version]

*(Redacts Material from
Conditionally Sealed Record)*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO - UNLIMITED JURISDICTION

COORDINATION PROCEEDING SPECIAL
TITLE (Rule 3.550)

In Re: Uber Rideshare Cases

Case No. CJC-21-005188

This Document Relates to:

ALL ACTIONS

UNREDACTED TRANSCRIPT - INCLUDES ALL TESTIMONY

VIDEOTAPED DEPOSITION OF MATTHEW BAKER

Chicago, Illinois

Wednesday, November 13th, 2024

* * * * *

THIS TRANSCRIPT CONTAINS CONFIDENTIAL AND
HIGHLY CONFIDENTIAL TESTIMONY

* * * * *

* * * * *

PAGE 154, LINE 15, THROUGH PAGE 154, LINE 17, WERE
DESIGNATED ATTORNEY-CLIENT PRIVILEGED AND ARE
REDACTED FROM THIS TRANSCRIPT

* * * * *

REPORTED BY: GREG S. WEILAND, CSR, RMR, CRR

JOB NO.: 6748151

10:14AM

1 BY MR. CUTTER:

2

Q.

10:15AM

10:15AM

9

MR. SMITH: Objection to the form the

10

question.

11

10:15AM

10:15AM

10:15AM

10:15AM

10:15AM

1

10:16AM

4

MR. SMITH: Objection to the form of the

5

question.

6

BY MR. CUTTER:

7

10:16AM

10

MR. SMITH: Brooks, we might take a break

11

at some point. I don't want to interrupt any

12

line of questioning you have going.

13

MR. CUTTER: Yeah, we'll be a few more

14

minutes here.

10:16AM

15

MR. SMITH: And if you ever need to take a

16

break, Mr. Baker, just say so.

17

MR. CUTTER: Well, that's true, sure.

18

MR. SMITH: Sure.

19

MR. CUTTER: So we're going to mark as our

10:16AM

20

next in order a document beginning -- well, the

21

cover is 00509993, and it's a long PowerPoint.

22

(Exhibit 303 was marked for

23

identification.)

10:17AM

24

BY MR. CUTTER:

10:17AM

25

Q. I don't expect you to review every page.

10:17AM

1 I'll ask you some questions about it, but you can
2 just familiarize yourself overall with it.

3 MR. SMITH: I'm going to instruct you, you
4 can take whatever time you need to --

10:17AM

5 MR. CUTTER: Of course.

6 MR. SMITH: -- to review the material
7 that's been put in front of you.

8 I'd just like to note for the record, the
9 document 303 does not have Bates numbers on it.

10:18AM

10 Again, I understand there may be various
11 reasons for that. I don't have a precise page
12 count, but I estimate it appears to be
13 approximately 100 pages.

14 BY MR. CUTTER:

10:18AM

15 Q. If you want, I can start asking you some
16 questions on specific pages, but if you want to take
17 your time to -- I'm not going to have questions on
18 every page, by any means.

19 MR. SMITH: Why don't you do whatever you

10:18AM

20 need to do --

21 MR. CUTTER: Yeah.

22 MR. SMITH: -- and tell Mr. Cutter when
23 you're ready to start answering questions.

10:18AM

24 THE WITNESS: Yeah, I'm comfortable taking

10:18AM

25 questions, with the understanding that if there

10:18AM

1 are questions that I need to contextualize, I
2 may need to review additional details
3 throughout this deck.

4

10:18AM

10:19AM

10:19AM

15 MR. SMITH: Objection to the form of the
16 question.

17

10:19AM

10:19AM

24 MR. SMITH: I think you talked over him at

10:19AM

25 the end. Please let the witness finish his

10:19AM

1 answer.

2 [REDACTED]

[REDACTED]

[REDACTED]

10:19AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:19AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:20AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:20AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:20AM

[REDACTED]

10:20AM

[REDACTED]

10:20AM

1

10:20AM

10:21AM

10:21AM

10:21AM

10:21AM

10:21AM

November 13, 2024

10:21AM

1

10:21AM

10:22AM

10:22AM

10:22AM

10:23AM

10:23AM

10:23AM

1

10:23AM

10:23AM

11

MR. SMITH: Objection to the form of the

12

question.

13

10:24AM

10:24AM

10:25AM

10:25AM

November 13, 2024

10:25AM



10:25AM



10:25AM

 ?

14 MR. SMITH: Objection to the form of the

10:25AM

15 question.



10:26AM



21 MR. SMITH: Wait. Tell him when you're

22 ready to answer questions --

23 MR. CUTTER: Yeah.

10:26AM

24 MR. SMITH: -- about the page he has asked

10:26AM

25 you about.

10:26AM

1 THE WITNESS: Sure.

2 BY MR. CUTTER:

3 Q. Looks like you found it.

4 A. I think I found it here, yes.

10:26AM

5 Okay.

6

10:26AM

12 MR. SMITH: Objection to the form of the
13 question.

14

10:26AM

10:27AM

10:27AM

10:27AM

25 MR. SMITH: Objection to the form of the

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10:27AM

1 question.

2

10:27AM

10:27AM

11 MR. SMITH: You don't need to flip along.

12 Just wait until he asks a question.

13 MR. CUTTER: Yes, that's fair.

14 BY MR. CUTTER:

10:28AM

15

10:28AM

10:28AM

10:28AM

10:28AM

1

2

MR. SMITH: Objection to the form.

3

BY MR. CUTTER:

4

Q. Is that true?

10:28AM

5

MR. SMITH: Objection to the form of the

6

question.

7

10:29AM

13

MR. SMITH: About two-thirds of the way

14

through, do you think?

10:29AM

15

MR. CUTTER: Yeah.

16

THE WITNESS: Okay. I believe I found it

17

here.

18

MR. SMITH: I want to get to the same page

19

as you. Just a second.

10:29AM

20

22

MR. SMITH: Okay. Just give me one

23

second.

10:30AM

24

10:30AM

November 13, 2024

10:30AM

1 Do you have one, like -- is there -- because
2 I'm not finding it. I just want to make sure I
3 get to the right page.

4

10:30AM

6

MR. SMITH: Okay.

7

10:30AM

10

MR. SMITH: Thanks for bearing with me.

11

MR. CUTTER: Sure.

12

I think you may be too far in.

13

MS. CUTTER: Yeah.

14

MR. CUTTER: It's earlier.

10:30AM

15

MR. SMITH: Okay. Sorry about that.

16

MR. CUTTER: You're fine.

17

10:30AM

20

MR. SMITH: Thank you. I'm ready. Thank

21

you.

22

10:30AM

10:30AM

10:31AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:31AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9

MR. SMITH: Objection to the form of the

10:31AM

10

question.

11

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:31AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:31AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:32AM

[REDACTED]

10:32AM

[REDACTED]

10:32AM

1

10:32AM

10:32AM

10:32AM

10:33AM

10:33AM

10:33AM

November 13, 2024

10:33AM

1

10:33AM

10:33AM

9

MR. SMITH: Objection to the form of the

10

question.

11

10:33AM

10:34AM

10:34AM

10:34AM

10:34AM

1

10:34AM

10:34AM

10:35AM

10:35AM

10:35AM

10:35AM

November 13, 2024

10:35AM

1

10:35AM

10:35AM

10:36AM

16 MR. SMITH: Hold on. Is there a question
17 pending?

18 BY MR. CUTTER:

19

10:36AM

22 MR. SMITH: Okay. Objection to the form
23 of the question as asked and answered.

10:36AM

24 You can answer if you understand the

10:36AM

25 question.

10:36AM

1

10:36AM

10:36AM

10:37AM

10:37AM

10:37AM

10:37AM

24

25

MR. SMITH: Objection to the form of the
question.

November 13, 2024

10:37AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:37AM

[REDACTED]

6

MR. SMITH: If you don't understand the

7

question, just say "I don't understand the

8

question."

9

BY MR. CUTTER:

10:37AM

10

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:37AM

[REDACTED]

[REDACTED]

17

MR. SMITH: Objection to the form of the

18

question.

19

[REDACTED]

10:38AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:38AM

[REDACTED]

10:38AM

25

MR. SMITH: Objection to the form of the

10:38AM

1 question.

2

10:38AM

10:38AM

10:38AM

10:38AM

10:39AM

10:39AM

10:39AM

1

10:39AM

10:39AM

10:39AM

10:40AM

10:40AM

10:40AM

November 13, 2024

10:40AM

1

10:40AM

10:41AM

10:41AM

14

MR. SMITH: Objection to the form of the

15

question.

16

10:41AM

10:42AM

10:42AM

10:42AM

1 [REDACTED]
[REDACTED]

3 Q. That's the right page.

4 A. Okay.

10:42AM

5 MR. SMITH: It says Slide 44 on the top?

6 MR. CUTTER: It does, yeah.

7 MR. SMITH: Thank you.

8 [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10:42AM

10:43AM

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10:43AM

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10:43AM

[REDACTED]

10:43AM

[REDACTED]

10:43AM

1

10:43AM

10:44AM

10:44AM

10:44AM

10:44AM

10:44AM

10:44AM

1

10:44AM

10:45AM

10:45AM

10:45AM

10:46AM

10:46AM

10:46AM

1

10:46AM

10:46AM

10:46AM

10:47AM

10:47AM

10:47AM

10:47AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:47AM

[REDACTED]

6

MR. SMITH: Thanks.

7

THE WITNESS: Okay. I believe I've found

8

it.

9

MR. SMITH: Thanks.

10:47AM

10 BY MR. CUTTER:

11

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:47AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:48AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:48AM

[REDACTED]

10:48AM

[REDACTED]

November 13, 2024

10:48AM

1

10:48AM

10:48AM

9 MR. SMITH: Objection to the form of the
10 question.
11

10:49AM

10:49AM

10:49AM

10:49AM

10:49AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:49AM

[REDACTED]

[REDACTED]

[REDACTED]

8

MR. SMITH: Objection to the form of the

9

question.

10:50AM

10

THE WITNESS: I want to make sure I

11

understand the question.

12

[REDACTED]

[REDACTED]

[REDACTED]

10:50AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19

MR. SMITH: Objection to the form of the

10:50AM

20

question.

21

[REDACTED]

[REDACTED]

[REDACTED]

10:50AM

[REDACTED]

10:50AM

[REDACTED]

10:50AM

1

10:50AM

10:51AM

10:51AM

10:51AM

10:52AM

10:52AM

10:52AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:52AM

[REDACTED]

[REDACTED]

[REDACTED]?

8

MR. SMITH: Objection to the form of the

9

question.

10:52AM

10

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14

MR. SMITH: Objection to the form of the

10:52AM

15

question.

16

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:52AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:53AM

[REDACTED]

10:53AM

[REDACTED]

10:53AM

1

10:53AM

6

MR. SMITH: Objection to the form of the

7

question.

8

10:53AM

10:53AM

10:54AM

10:54AM

10:54AM

10:54AM

1

10:54AM

10:54AM

8

MR. SMITH: Objection to the form of the

9

question.

10:54AM

10

10:55AM

10:55AM

10:55AM

10:55AM

1

2

3

4

10:55AM

10:55AM

10:55AM

10:56AM

10:56AM

10:56AM

MR. SMITH: Objection to the form of the
question.

10:56AM

1

10:56AM

5

MR. SMITH: Objection to the form of the

6

question.

7

10:56AM

11

MR. SMITH: And, Brooks, I do think it

12

would be appropriate to take a break when you

13

get to a break in your line of questioning,

14

unless the witness prefers one more immediately

10:56AM

15

or sooner.

16

BY MR. CUTTER:

17

Q. How are you doing?

18

A. I'm doing okay. I don't know if we want

19

to finish this document and then maybe take a break.

10:56AM

20

Q.

10:57AM

10:57AM

10:57AM

1

10:57AM

10:58AM

10:58AM

10:58AM

10:59AM

10:59AM

10:59AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:59AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:00AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:00AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:00AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:00AM

[REDACTED]

11:00AM

[REDACTED]

11:01AM

1

Q.

11:01AM

11:02AM

11:03AM

11:03AM

20

MR. SMITH: Objection to the form of the

21

question.

22

11:03AM

11:03AM

11:03AM

1

11:03AM

5

MR. SMITH: Can you please just let the

6

witness finish his answer.

7

BY MR. CUTTER:

8

Q. We can just move on.

9

11:03AM

10

13

MR. SMITH: Objection to the form of the

14

question.

11:03AM

15

11:03AM

11:04AM

11:04AM

November 13, 2024

11:04AM

1

11:04AM

11:04AM

11:04AM

11:05AM

11:05AM

11:05AM

25

MR. SMITH: Objection to the form of the

11:05AM

1 question.

2

11:05AM

11:06AM

13 MR. CUTTER: Okay. We can take a break.

14 MR. SMITH: Before we go off the record, I

11:06AM

15 just have an issue I want to state about
16 Exhibit 302, that issue that the metadata of
17 that document as reflected in the first page of
18 the exhibit reflects that it appears to be a
19 family of documents that consists of
20 approximately 43 pages, but the document that
21 was handed to the witness was five pages. And
22 so, therefore, it appears to be an incomplete
23 document.

11:06AM

24 And so I object to the line of questioning

11:06AM

25 about that document to the extent it was based

11:29AM

1

2

3

4

11:30AM

5

6

8

9

11:30AM

10

11:30AM

11:30AM

11:31AM

11:31AM

Q. During the time you've been at Uber, has Uber had a requirement of running a background check on drivers before they begin to use the platform?

A. Yes.

?

MR. SMITH: Objection to the form of the question.

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11:31AM

1

A.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:31AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:31AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:32AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:32AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:32AM

[REDACTED]

11:32AM

[REDACTED]

UNREDACTED TRANSCRIPT -

04/01/25 Page 47 of 88
INCLUDES ALL TESTIMONY

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1

1 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible][illegible][illegible]

Service	Percentage
Used a service	85%
Used a service	15%
Used a service	30%
Used a service	10%
Used a service	25%
Used a service	10%
Used a service	10%
Used a service	10%
Used a service	10%
Used a service	10%

25

25 MR. SMITH: Object to the form of the

11:34AM

1 question.

2

11:34AM

11:34AM

11:34AM

14 MR. SMITH: Objection to the form of the
15 question.

16

11:35AM

11:35AM

11:35AM

11:35AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] n?

11:35AM

5

MR. SMITH: Objection to the form of the

6

question.

7

[REDACTED]

[REDACTED]

[REDACTED]

11:35AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:36AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:36AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:36AM

[REDACTED]

11:36AM

25

MR. SMITH: Objection to the form of the

11:36AM

1 question.

2

11:36AM

11:36AM

10 MR. SMITH: Objection to the form of the
11 question, in particular to the phrase "your
12 drivers" as vague and ambiguous.

13 BY MR. CUTTER:

14

11:36AM

11:37AM

20 MR. SMITH: I object to the form of the
21 question and the characterizations in the
22 question and the compound nature of it.

23 BY MR. CUTTER:

11:37AM

24

11:37AM

11:37AM

1

11:37AM

11:37AM

12 MR. SMITH: Objection to the form of the
13 question.

14

11:37AM

11:38AM

11:38AM

24

MR. SMITH: Objection to the form of the

11:38AM

25

question.

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11:38AM

1

11:38AM

11:38AM

10

11:38AM

11:38AM

20

21

22

11:38AM

11:38AM

8 MR. SMITH: Objection to the form of the
9 question.

20 MR. SMITH: Objection to the form of the
21 question.

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11:38AM

1 [REDACTED]?

2 MR. SMITH: Objection to the form of the

3 question.

4 [REDACTED]

11:39AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:39AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:39AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:39AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:39AM

24 MR. SMITH: Objection to the form of the

11:39AM

25 question.

11:39AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:39AM

[REDACTED]

[REDACTED]

[REDACTED] ?

8

MR. SMITH: Same objection.

9

[REDACTED]

11:39AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:40AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:40AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:40AM

[REDACTED]

11:40AM

[REDACTED]

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11:40AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:40AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:41AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:41AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:41AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:41AM

[REDACTED]

11:41AM

[REDACTED]

11:41AM

1

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]?

11:42AM

5

MR. SMITH: Objection to the form of the

6

question.

7

[REDACTED]

[REDACTED]

[REDACTED]

11:42AM

[REDACTED]?

11

MR. SMITH: Objection to the form of the

12

question.

13

[REDACTED]

[REDACTED]

11:42AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:42AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:42AM

[REDACTED]

11:42AM

[REDACTED]

11:43AM

1

11:43AM

11:43AM

11:43AM

11:44AM

19 MR. SMITH: Objection to the form of the
20 question.

21

11:44AM

11:44AM

11:44AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:44AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:44AM

10

MR. SMITH: Objection to the form of the

11

question.

12

[REDACTED]

[REDACTED]

[REDACTED]

11:44AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:45AM

20

MR. SMITH: Objection to the form of the

21

question.

22

[REDACTED]

[REDACTED]

11:45AM

[REDACTED]

11:45AM

[REDACTED]

11:45AM

1

11:45AM

11:45AM

11

MR. SMITH: Objection to the form of the

12

question.

13

11:45AM

11:46AM

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11:46AM

25

MR. SMITH: Objection to the form of the

11:46AM

1 question.

2

11:46AM

11:46AM

11:46AM

14 MR. SMITH: Objection to the form of the
15 question.

16

11:47AM

11:47AM

11:47AM

11:47AM

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11:47AM

11:47AM

10

MR. SMITH: Objection to the form of the

11

question.

12

11:47AM

11:48AM

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11:48AM

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1

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7

MR. SMITH: Objection to the form of the

8

question.

9

11:48AM

11:48AM

18

MR. SMITH: Objection to the form of the

19

question.

11:48AM

20

If you understand it, you can answer.

21

11:49AM

11:49AM

11:49AM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:49AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:49AM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:49AM

[REDACTED]

[REDACTED]

[REDACTED]

18 MR. SMITH: Objection to the form of the

19 question.

11:50AM

20

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:50AM

[REDACTED]

11:50AM

[REDACTED].

11:50AM

1

11:50AM

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11:51AM

23

MR. SMITH: Objection to the form of the

11:51AM

24

question.

11:51AM

25

November 13, 2024

2:47PM

1 BY MR. CUTTER:

2

2:47PM

2:48PM

13 MR. SMITH: Objection to the form.

14

2:48PM

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2:48PM

2:48PM

2:49PM

1

[REDACTED]

[REDACTED]

[REDACTED]

4

MR. SMITH: Objection to the form.

2:49PM

5

THE WITNESS: I don't know.

6

BY MR. CUTTER:

7

[REDACTED]

[REDACTED]

[REDACTED]

2:49PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2:49PM

[REDACTED]

16

MR. SMITH: Objection to the form of the

17

question.

18

[REDACTED]

[REDACTED]

2:49PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2:50PM

[REDACTED]

2:50PM

[REDACTED]

2:50PM

1

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15

MR. SMITH: Objection to the form.

16

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7

MR. SMITH: Objection to the form.

8

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November 13, 2024

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2:55PM

25

MR. SMITH: Had you completed your prior

2:55PM

1 answer?

2 THE WITNESS: Yeah.

3 MR. SMITH: Okay. Just asking. You can

4 answer the current question if you understand

2:55PM

5 it.

6

2:55PM

2:56PM

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2:56PM

November 13, 2024

2:56PM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2:56PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2:57PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2:57PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2:57PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2:57PM

[REDACTED]

2:57PM

25

MR. CUTTER: Let's go to 129845.

2:57PM

1 (Exhibit 313 was marked for
2 identification.)

3 THE WITNESS: Okay. I've reviewed the
4 document.

2:59PM

5 BY MR. CUTTER:

6

2:59PM

2:59PM

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November 13, 2024

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15

MR. SMITH: Objection to the form.

16

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3:04PM

9

MR. SMITH: Objection to the form of the

10

question.

11

3:05PM

3:05PM

3:05PM

3:05PM

3:05PM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3:05PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3:05PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3:06PM

14

MR. SMITH: Objection to the form of the

15

question.

16

THE WITNESS: Yeah.

17

MR. CUTTER: Going to 000684933.

18

(Exhibit 314 was marked for

19

identification.)

3:09PM

20

THE WITNESS: Okay. I have the context.

21

[REDACTED]

[REDACTED]

[REDACTED]

3:09PM

[REDACTED]

3:09PM

[REDACTED]

4:51PM

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4:51PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4:51PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4:51PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4:52PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4:52PM

[REDACTED]

4:52PM

[REDACTED]

4:52PM

1

4:52PM

7

Q. And has the Uber Safety Report itself

8

documented that sexual assault and sexual violence

9

is significantly underreported?

4:52PM

10

A. To the best of my recollection, there may

11

be references to underreporting as a systemic

12

problem that Uber is aware of societally.

13

Q. So, in fact, the report cites studies

14

showing that as few as one in four sexual assaults

4:52PM

15

or instances of sexual misconduct are actually

16

reported, true?

17

A. I don't have recollection of the specific

18

statistics in the report, but I don't refute that.

19

4:53PM

22

MR. SMITH: Objection to the form of the

23

question.

4:53PM

24

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4:54PM

17

MR. SMITH: Objection to the form.

18

4:54PM

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5:22PM

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5:23PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5:23PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5:23PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5:23PM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5:24PM

[REDACTED]

5:24PM

[REDACTED]

5:24PM

1

5:24PM

5:24PM

5:25PM

16 MR. SMITH: Objection to the form of the
17 question.

18

5:25PM

5:25PM

5:25PM

5:25PM

1 MR. SMITH: Objection to the form of the
2 question.

3

5:25PM

7 BY MR. CUTTER:

8 Q. In terms of the Safety Report itself, does
9 it cover all 21 categories of sexual assault and

5:25PM

10 sexual misconduct in the Uber taxonomy?

11 A. No.

12

5:25PM

17 MR. SMITH: Objection to the form of the
18 question.

19

5:25PM

5:26PM

5:26PM

5:26PM

1 [REDACTED]
2 MR. SMITH: Objection to the form of the
3 question.
4 [REDACTED]

5:26PM

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

5:26PM

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

14 MR. SMITH: Objection to the form.

5:26PM

15 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

5:26PM

20 MR. SMITH: Objection to the form.

21 [REDACTED]
[REDACTED]
[REDACTED]

5:27PM

[REDACTED]

5:27PM

[REDACTED]

1 C E R T I F I C A T E

2

3 The within and foregoing deposition of the
4 witness, MATTHEW BAKER, was taken before GREG S.
5 WEILAND, CSR, RMR, CRR, at Suite 4700, 111 South
6 Wacker Drive, in the City of Chicago, Cook County,
7 Illinois, commencing at 9:42 o'clock a.m. Central
8 Standard Time, on the 13th day of November, 2024.

9

10 The said witness was first duly sworn and
11 was then examined upon oral interrogatories; the
12 questions and answers were taken down in shorthand
13 by the undersigned, acting as stenographer; and the
14 within and foregoing is a true, accurate and
15 complete record of all the questions asked of and
16 answers made by the aforementioned witness at the
17 time and place hereinabove referred to.

18

19 The signature of the witness was not
20 waived and the deposition was submitted to the
21 deponent as per copy of the attached letter.

22

23 The undersigned is not interested in the
24 within case, nor of kin or counsel to any of the
25 parties.

November 13, 2024

1 Witness my signature on this 18th day of
2 November, 2024.

3

4

5



6 GREG S. WEILAND, CSR, RMR, CRR

7 License No. 084-003472

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1

2 PRESENT:

3

4 ON BEHALF OF THE PLAINTIFFS:

CUTTER LAW, P.C.

5 BY: MR. C. BROOKS CUTTER

MS. CELINE E. CUTTER

6 401 Watt Avenue

Sacramento, California 95864

7 (916) 290-9400

Email: bcutter@cutterlaw.com

8 ccutter@cutterlaw.com

- and -

9 WILLIAMS HART & BOUNDAS, LLP

BY: MR. BRIAN ABRAMSON (via Zoom)

10 MS. STASJA DRECUN (via Zoom)

8441 Gulf Freeway, Suite 600

11 Houston, Texas 77017

(713) 230-2200

12 Email: babramson@whlaw.com

sdrecun@whlaw.com

13 PRESENT (CONTINUED):

14

15 ON BEHALF OF DEFENDANT UBER:

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

16 BY: MR. KYLE SMITH

2001 K Street, NW

17 Washington, DC 20006-1047

(202) 223-7407

18 Email: ksmith@paulweiss.com

- and -

19 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

BY: MR. LOUIS A. MURRAY

20 1285 Avenue of the Americas

New York, NY 10019-6064

21 (212) 373-2749

Email: lmurray@paulweiss.com

22

ALSO PRESENT:

23 MR. LUCAS SCHROEDER, The Videographer

MS. JOANNE MOON, Senior Counsel, Uber

24 MR. VINCE ROSICA, Tech (via Zoom)